

EXHIBIT C

Cathy Fleming

From: Lockard, Michael (USANYS) <Michael.Lockard@usdoj.gov>
Sent: Thursday, October 26, 2017 12:48 AM
To: Thornhill, Thomas; Rocco, Victor; Cathy Fleming
Cc: Kamaraju, Sidhardha (USANYS); Denton, David (USANYS); Sovolos, Dean (USANYS)
Subject: RE: United States v. Zarrab, et al., 15 Cr. 867 (RMB)

Thanks for your letter. We will not consent to the further modifications you propose to the protective order. The modifications we proposed were an effort at compromise and accommodation, while protecting legitimate and compelling government interests, with respect to a protective order that is stipulated and thus subject to modification by the court on only the most limited of grounds, which you have not demonstrated in our discussions. We also do not believe the identification information you propose for non-Halk Bank employees is adequate. We will notify the court tomorrow that our discussions have failed to yield agreement.

With respect to Ms. Fleming's letter dated October 16, we do not believe that Rule 16 or any other rule requires the pretrial disclosure you request. We advise you nonetheless that we are aware of no participation by any US government agency in making the recordings. We further advise you that the audio files that have been produced in discovery are exact digital duplicates of the audio files in the Government's possession. If you wish to have the recordings inspected by an expert we will consider the request upon your identification of the expert you propose to conduct the examination.

Regards,

Michael D. Lockard
Assistant United States Attorney
Southern District of New York | One St. Andrew's Plaza | New York, New York 10007
(212) 637-2193 (desk) | (212) 637-0097 (facsimile) | michael.lockard@usdoj.gov

From: Thornhill, Thomas [mailto:tthornhill@herrick.com]
Sent: Tuesday, October 24, 2017 2:31 PM
To: Lockard, Michael (USANYS) <MLockard@usa.doj.gov>; Kamaraju, Sidhardha (USANYS) <SKamaraju@usa.doj.gov>; Denton, David (USANYS) <DDenton@usa.doj.gov>; Sovolos, Dean (USANYS) <DSovolos@usa.doj.gov>
Cc: Rocco, Victor <vrocco@herrick.com>; Cathy Fleming (cfleming@flemingruvoldt.com) <cfleming@flemingruvoldt.com>
Subject: United States v. Zarrab, et al., 15 Cr. 867 (RMB)

Gentlemen:

Please see the attached correspondence following up on our "meet and confer" telephone conference this morning.

Regards,
Tom

